



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 14, 2022

**By ECF**

The Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Steven Herrera and Wael Hamad*, 21 Cr. 680 (JGK)**

Dear Judge Koeltl:

The parties understand that the Court is available for a plea conference for defendant Steven Herrera on November 15, 2022 at 2:30 PM, and the Court is available for a plea conference for defendant Wael Hamad on November 29, 2022 at 4:30 PM. A trial in this matter is currently scheduled for January 9, 2023. The deadline for the parties to file motions *in limine*, voir dire, and requests to charge is currently November 18, 2022. In light of the expected plea date, the Government, with consent of counsel for the defendants, respectfully requests that the November 18, 2022 deadlines be adjourned to December 7, 2022, so that, in the event the pleas do not go forward, the parties can prepare their submission to the Court.

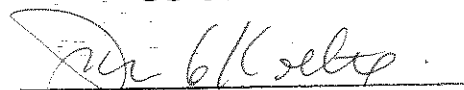
Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: /s/  
Rebecca T. Dell / Kaylan E. Lasky  
Assistant United States Attorneys  
(212) 637-2198 / 2315

cc: Counsel of record (by ECF)

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

11/14/22